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17 CROWN EQUIPMENT CORPORATION

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION
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18 JESSE HOUGHTAILING,
19 Plaintiff,
20 v.

21 CROWN EQUIPMENT CORPORATION.,
22 and DOES 1 TO 100, inclusive,
23 Defendants.
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CASE NO. 311-cv-05040-TEH
Judge: Hon. Thelton E. Henderson

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO CONTINUE ADR DEADLINE**

Action Filed: August 3, 2011
Removal Filed: October 13, 2011
Trial Date: None Set

1 TO THIS HONORABLE COURT:

2 Plaintiff Jesse Houghtailing (hereinafter "Plaintiff"), by and through his counsel, and
3 Defendant Crown Equipment Corporation ("Defendant"), by and through its counsel, do hereby
4 agree, stipulate, and respectfully request as follows:

5 1. WHEREAS, on June 11, 2012, the Court held a further Case Management
6 Conference in this action;

7 2. WHEREAS, at that Case Management Conference, the Court and the parties
8 discussed the timing of discovery in this matter, in particular the deposition of Plaintiff, and the
9 impact of that discovery on the then-current ADR deadline of July 31, 2012;

10 3. WHEREAS, at that time the Court and the parties agreed that the parties would
11 proceed with discovery, and would submit a stipulation to extend the ADR deadline if necessary;

12 4. WHEREAS on July 24th and 25th, Defendant began Plaintiff's deposition;

13 5. WHEREAS, the parties are attempting to find a mutually agreeable date to
14 complete Plaintiff's deposition; and

15 5. WHEREAS the parties have met and conferred regarding availability for and
16 timing of a private mediation, and believe that, in light of their discussion, it would be appropriate
17 to continue the ADR deadline in this matter until November 16, 2012;

18 6. WHEREFORE THE PARTIES HEREBY STIPULATE AND REQUEST, subject
19 to the Court's approval, that the ADR deadline in this matter be continued until November 16,
20 2012.

21 IT IS SO STIPULATED.

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23 Dated: September 10, 2012

DUCHARME & COHEN

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25 By _____/s/
26 JAMES A. DuCHARME
27 Attorneys for Plaintiff
JESSE HOUGHTAILING

1 Dated: September 10, 2012

KRIEG, KELLER, SLOAN, REILLEY & ROMAN LLP

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3 By

/s/

MICHAEL D. LISI

Attorneys for Defendant

CROWN EQUIPMENT CORPORATION

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6 I hereby attest that I have been authorized by James A. DuCharme to execute on his behalf
7 this Stipulation and [Proposed] Order to Continue Case Management Conference.

8 Executed on this 10th day of September, 2012 at San Francisco, California.

9 Dated: September 10, 2012

KRIEG, KELLER, SLOAN, REILLEY & ROMAN LLP

10
11 By:

/s/

MICHAEL D. LISI

Attorneys for Defendant

CROWN EQUIPMENT CORPORATION

~~[PROPOSED]~~ ORDER

Having considered the foregoing stipulation of the parties, the Court hereby orders that the ADR deadline in the instant matter, Jesse Houghtailing v. Crown Equipment Corp., Case Number 311-cv-05040-TEH, shall be continued until November 16, 2012.

IT IS SO ORDERED.

Dated: 09/11, 2012

